

Patrick G. Byrne, Esq.
Nevada Bar No. 7636
Richard C. Gordon, Esq.
Nevada Bar No. 9036
Paul Swenson Prior, Esq.
Nevada Bar No. 9324
Christian P. Ogata, Esq.
Nevada Bar No. 15612
SNELL & WILMER L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
Email: pbyrne@swlaw.com
rgordon@swlaw.com
sprior@swlaw.com
cogata@swlaw.com

Attorneys for Defendant City of Henderson

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LaTasha Watson,

Plaintiff

v.

City of Henderson, et al.,

Defendants

Case No.: 2:20-cv-01761-CDS-BNW

**Stipulation and Order Extending
Deadlines for Responses and Replies to
Motions for Summary Judgment**

(SECOND REQUEST)

Defendants City of Henderson (the “City”), Kevin Abernathy, and plaintiff LaTasha Watson (collectively the “Parties”) stipulate to extend the deadline for the Parties’ to respond to the motions for summary judgment up to and including April 14, 2023, and the replies in support of those motions up to and including May 5, 2023. The Parties make the following stipulation for good cause, not for the purpose of delay, and for the following reasons:

1. On November 1, 2021, Watson amended her complaint, asserting nine causes of action against the City, Abernathy, and several previously named individual defendants.
2. During discovery, Watson voluntarily dismissed five of those defendants and another after it had closed.

1 3. On February 16, 2023, Judge Weksler granted the Parties' stipulation to extend the
2 dispositive motion deadline to February 22, 2023.¹

3 4. Watson then filed two motions for partial summary judgment: one against the City²
4 and one against Abernathy.³

5 5. The City and Abernathy both also filed motions for summary judgment.⁴

6 6. After the motions for summary judgment were filed, Judge Weksler granted
7 Abernathy's motion to compel additional deposition testimony from Watson. That deposition took
8 place on March 23, 2023, and the transcript for that deposition became available on April 2, 2023.

9 7. This Court previously granted an extension for these briefing deadlines, setting the
10 responses for April 7, 2023, and the replies for April 28, 2023.

11 8. Given the number of claims still at issue in this dispute and on which the Parties
12 have moved for summary judgment on, and the complex legal issues involved within each, the
13 conclusion of Watson's recent deposition, and because of a recent family emergency, the Parties
14 need additional time to complete responses and their replies to the motions.

15 9. The Parties have agreed to the extensions requested.

16 10. This stipulation is made in good faith and not for the purpose of delay.

17
18
19
20
21
22
23
24
25
26 ¹ ECF No. 155.

27 ² ECF No. 157.

28 ³ ECF No. 158.

⁴ ECF Nos. 162, 164.

Therefore, the Parties respectfully request an extension for the Parties to file their responses to the pending motions for summary judgment, up to and including April 14, 2023, and the replies in support of those motions up to and including May 5, 2023.

DATED this 6th day of April 2023.

COOK & KELESIS, LTD.

/s/ Julie L. Sanpei

Marc P. Cook, (NV Bar No. 4574)

Julie L. Sanpei (NV Bar No. 5479)

517 S. 9th Street

Las Vegas, Nevada 89101

Phone: (702) 737-7702

Fax: (702) 737-7712

Attorneys for Plaintiff Latesha Watson

DATED this 6th day of April 2023.

SNELL & WILMER, LLP

/s/ Richard C. Gordon

Patrick G. Byrne (NV Bar No. 7636)

Richard C. Gordon (NV Bar No. 9036)

Paul Swenson Prior (NV Bar No. 9324)

Christian P. Ogata (NV Bar No. 15612) 3883

Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89169

Phone: (702) 784-5200

Fax: (702) 784-5252

Attorneys for Defendant City of Henderson

DATED this 6th day of April 2023.

CLARK HILL PLLC

/s/ Nicholas M. Wiczorek

Nicholas M. Wiczorek, Esq.

1700 Pavilion Center Drive, Suite 500

Las Vegas, Nevada 89135

Attorneys for Defendant Kevin Abernathy

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the parties' stipulation is GRANTED. Responses to the motions for summary judgment [ECF Nos. 157, 158, 162, 164] shall be due on April 14, 2023. The replies in support of those motions shall be due on May 5, 2023.

IT IS SO ORDERED.

DATED: April 10, 2023


UNITED STATES DISTRICT JUDGE